

Remarks/Arguments:

1. Claims 15 and 16 have been cancelled and are no longer in the case.
2. New claim 17 has been added to more specifically point out and distinctly claim those features of the invention that Applicant regards as patentable subject matter.
3. Applicant respectfully argues that the Examiner is deceptively using the argument from omniscient hindsight in combining the references, especially in combining the u-shaped tool shown in Chartier with the Kemnitz device. There is nothing in Kemnitz that suggests, teaches, or discloses the use of a u-shaped tool and/or a right-angled tool, and, therefore, the combination is purely speculative and ad hoc – especially since Kemnitz had the Chartier reference available to him, but did not suggest or disclose the use of either the u-shaped tool or the right-angled tool.
4. Thus, in view of the above, Applicant respectfully requests allowance of new claim 17 and passage of the case to full issuance. No new subject matter has been added by this amendment, and Applicant has made a good faith effort to overcome the Examiner's objections and rejections.

Respectfully submitted,

